

**THE ROSEN LAW FIRM, P.A.**

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[Proposed] Lead Counsel for Plaintiffs and Class

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CARLOS MUNOZ, INDIVIDUALLY AND  
ON BEHALF OF ALL OTHERS SIMILARLY SITUATED,

Plaintiff,

vs.

CHINA EXPERT TECHNOLOGY, INC.; ZHU  
XIAOXIN; HUANG TAO; and FU WAN  
CHUNG, a/k/a SIMON FU,

Defendants.  
-----X

CASE No.: 07-CV-10531 (AKH)

**NOTICE OF MOTION OF  
THE CXTI NVESTORS TO:  
(1) APPOINT LEAD  
PLAINTIFFS; AND (2)  
APPROVE LEAD  
PLAINTIFFS' SELECTION  
OF COUNSEL**

**CLASS ACTION**

**PLEASE TAKE NOTICE** that pursuant to Section 21 D of the Securities and Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), Plaintiffs Joseph Nunn; The Hantash Family consisting of Basil Hantash, his mother Amna Hantash, and his brother Bashar Hantash; and Kenneth Price (collectively "Movants" or "CXTI Investors") hereby move this Court, the Honorable Alvin K. Hellerstein, United States District Judge, for an order:

(a) appointing the CXTI Investors and each of its members to serve as Lead Plaintiffs in this action; and

(b) approving the CXTI Investors' selection of The Rosen Law Firm, P.A. as Lead Counsel for the litigation.

In support of this Motion, Movant submits: (1) the Declaration of Phillip Kim dated January 22, 2008 (with exhibits); (2) Memorandum of Law dated January 22, 2008; and (3) a [Proposed] Order granting Movants' Motion to appointing Lead Plaintiffs, and approving Lead Plaintiffs' selection of Counsel.

Respectfully submitted,

Dated: January 22, 2008

**THE ROSEN LAW FIRM, P.A.**

/s/ Phillip Kim

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[Proposed] Lead Counsel for Plaintiffs and Class

**CERTIFICATE OF SERVICE**

I hereby certify that on this on the 22<sup>nd</sup> day of January, 2008, a true and correct copy of the foregoing NOTICE OF MOTION OF THE CXTI INVESTORS TO: (1) APPOINT LEAD PLAINTIFFS; AND (2) APPROVE LEAD PLAINTIFFS' SELECTION OF COUNSEL was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Phillip Kim

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CARLOS MUNOZ, INDIVIDUALLY AND  
ON BEHALF OF ALL OTHERS SIMILARLY SITUATED,

CASE No.: 07-CV-10531 (AKH)

CLASS ACTION

Plaintiff,

vs.

CHINA EXPERT TECHNOLOGY, INC.; ZHU  
XIAOXIN; HUANG TAO; and FU WAN  
CHUNG, a/k/a SIMON FU,

Defendants.  
-----X

**[PROPOSED] ORDER**

WHEREAS, the above-captioned securities class action has been filed against defendants China Expert Technology, Inc. and certain of its present and former officers and directors, alleging violations of the federal securities laws;

WHEREAS, pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4(a)(3)(A)(i), on November 21, 2007, Plaintiff in the above-captioned action caused notice to be issued to potential class members of the action and informed them of their right to move to serve as lead plaintiff within 60 days of the date of the issuance of said notice;

WHEREAS, on January 22, 2008, Plaintiffs Joseph Nunn; The Hantash Family consisting of Basil Hantash, his mother Amna Hantash, and his brother Bashar Hantash; and Kenneth Price (the “CXTI Investors”), moved the Court to: (1) appoint each of themselves and collectively as lead plaintiffs; and (2) approve their selection of the Rosen Law Firm, P.A. as lead counsel; and

WHEREAS, the Court finding that CXTI Investors have the largest financial interest in this action and *prima facie* satisfy the typicality and adequacy requirements of Fed. R. Civ. P. 23. See 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I).

**IT IS HEREBY ORDERED THAT:**

1. Pursuant to Section 21D(a)(3)(B) of the Exchange Act, 15 U.S.C. §78u-4(a)(3)(B), the CXTI Investors and each of its members are appointed Lead Plaintiffs for the class as they have the largest financial interest in this litigation and otherwise satisfy the requirements of Fed. R. Civ. P. 23.

2. The CXTI Investors' choice of counsel is approved and accordingly, the Rosen Law Firm, P.A. is appointed Lead Counsel.

3. Lead Counsel, after being appointed by the Court, shall manage the prosecution of this litigation. Lead Counsel is to avoid duplicative or unproductive activities and are hereby vested by the Court with the responsibilities that include, without limitation, the following: (1) to prepare all pleadings; (2) to direct and coordinate the briefing and arguing of motions in accordance with the schedules set by the orders and rules of this Court; (3) to initiate and direct discovery; (4) prepare the case for trial; and (5) to engage in settlement negotiations on behalf of Lead Plaintiffs and the Class.

SO ORDERED:

Dated \_\_\_\_\_, 2008

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HONORABLE ALVIN K. HELLERSTEIN  
UNITED STATES DISTRICT JUDGE